

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SIMONE CLARKE.

Plaintiff

-against-

NEW YORK CITY DEPARTMENT OF  
EDUCATION, CLAUDETTE CHRISTIE,  
PRINCIPAL OF WATCH HIGH SCHOOL,

Defendants.  
----- X

**PLAINTIFF'S SUPPLEMENTAL  
REPLY DECLARATION IN  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

**18 CV 1850 (NGG)(JO)**

**BRYAN GLASS**, pursuant to 28 U.S.C. § 1746, declares that the following is  
true and correct:

1. I am the attorney for Plaintiff Simone Clarke ("CLARKE") in the above-captioned matter. As such, I am familiar with the facts stated herein.

2. I submit this supplemental declaration in further opposition to Defendants' motion for summary judgment pursuant to Rule 56(b) of the Federal Rules of Civil Procedure.

3. Annexed hereto as Exhibits "1" to "5" are admissible documents and excerpts from the depositions taken of Plaintiff and Defendant Christie in this action and related actions which are relied upon and cited in Plaintiff's Local Civil Rule 56.1 counterstatement of undisputed material facts, and Plaintiff's memorandum of law submitted herewith in opposition to Defendants' motion. These documents and excerpts are as follows:

- A. Annexed hereto as Exhibit "1" is a true and correct copy of photos produced by Defendants on October 18, 2018, identified as D0176-0181.
- B. Annexed hereto as Exhibit "2" is a true and correct copy of text messages between Ms. Clarke and Sheila Hanley, produced by Defendants to Plaintiff on October 18, 2018, identified as D00166-

00175, and produced by Plaintiff to Defendants on October 18, 2018, identified as P0118 – 0127.

- C. Annexed hereto as Exhibit “3” is a true and correct copy of the November 20, 2018 confirmation email chain between Jenna Krueger and Bryan Glass.
- D. Annexed hereto as Exhibit “4” is a true and correct copy of the transcript of the full unedited audio recording of the May 20, 2016 conversation between Ms. Clarke and Principal Christie.
- E. Annexed hereto as Exhibit “5” is a true and correct copy of the transcript of the full unedited audio recording of the April 20, 2016 conversation between Ms. Clarke and Elizabeth Ramos.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
November 8, 2019

**GLASS & HOGROGIAN LLP**  
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By: s/   
Bryan D. Glass, Esq.